

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BRITTNEY BIEHNER a/k/a BRITTNEY REILLY,

Plaintiff,

-against-

THE CITY OF NEW YORK; NEW YORK CITY
DEPARTMENT OF EDUCATION; OMOTAYO
CINEUS; STEVE TRAVERSIERE; and "JOHN DOE
AND JANE DOE #1-100" said names being fictitious, it
being the intent of Plaintiff to designate any and all
individuals, officers, members, agents, servants, and/or
employees of the aforementioned agencies owing a duty
of care to Plaintiff, individually and jointly and severally,

Defendants.

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**DECLARATION OF
ASSISTANT CORPORATION
COUNSEL ALANA R.
MILDNER IN SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS THE AMENDED
COMPLAINT**

Civil Action No. 19 Civ. 9646
(JGK)

ALANA R. MILDNER, declares that the following is true and correct under
penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an Assistant Corporation Counsel in the office of James E. Johnson,
Corporation Counsel of the City of New York, attorney for Defendants City of New York, New
York City Department of Education, Omotayo Cineus, and Steve Traversiere in the above
referenced action.

2. I submit this declaration in order to place before the Court a document
incorporated by reference into Plaintiff's Amended Complaint and offered in support of
Defendants' motion to dismiss pursuant to Federal Civil Procedure Rule 12(b)(6). The document
is attached hereto as:

Exhibit A: Collective Bargaining Agreement between United Federation of
Teachers and New York City Department of Education, 2008 -
2019

I declare under penalty of perjury that the foregoing is true and correct.

Executed On: New York, New York
April 3, 2020

/s/

Alana R. Mildner
Assistant Corporation Counsel